

1 PAUL K. CHARLTON
United States Attorney
2 District of Arizona
MARY SUE FELDMEIER
3 Assistant U.S. Attorney
United States Courthouse
4 405 W. Congress St., Suite 4800
Tucson, Arizona 85701
5 Telephone: (520) 620-7300
E-mail: mary.sue.feldmeier@usdoj.gov
6 Attorneys for Plaintiff

7
8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF ARIZONA**

10 **United States of America,**
11 **Plaintiff,**

12 **v.**

13 **Paul C. Smith,**
14 **Defendant.**

CR06-2166TUC

INDICTMENT

Violation:
18 U.S.C. § 641

(Theft of Public Property and Money)

15
16 **THE GRAND JURY CHARGES:**

17 **COUNT 1**

18 From a time unknown through and including October 4, 2006, at or near Casa Grande,
19 in the District of Arizona, PAUL C. SMITH, did embezzle, steal, purloin, and knowingly
20 convert to his use, and without authority sold, conveyed and disposed of property of the
21 United States of America, or any department or agency thereof, to wit: he took at least 35
22 motorcycle tires and at least 10 motorcycle "Bib mousse tube" inner tubes, which he had
23 purchased with United States Border Patrol charge accounts in a total amount in excess of
24 \$1,000.00, and without authority sold said government-owned tires and inner tubes to K &
25 C Budget Muffler & Performance in Casa Grande, Arizona, in exchange for checks
26 personally issued to him in the total amount of \$2,750.00, which monies he personally
27 retained, in violation of Title 18, United States Code, Section 641.
28

COUNT 2

On or about December 12, 2006, at or near Casa Grande, in the District of Arizona, PAUL C. SMITH, did embezzle, steal, purloin, and knowingly convert to his use, monies of the United States of America, or any department or agency thereof, to wit: he charged \$1,000.00 to United States Border Patrol charge account xxxx-xxxx-xxxx-8413 to pay K & C Budget Muffler & Performance in Casa Grande, Arizona, for repairs and enhancements to a privately owned golf cart which he intended to gift to a private citizen, in violation of Title 18, United States Code, Section 641.

A TRUE BILL

REDACTED FOR
PUBLIC DISCLOSURE


Presiding Juror

DEC 20 2006

PAUL K. CHARLTON
United States Attorney
District of Arizona


Assistant United States Attorney